

EXHIBIT “A”

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)			
		JUNE 2025			
		E-Filing Number: 2506063502			
PLAINTIFF'S NAME GARY COHEN		DEFENDANT'S NAME STADIUM CASINO RE, LLC, ALIAS: LIVE CASINO & HOTEL PHILADELPHIA			
PLAINTIFF'S ADDRESS 246 TRESANA BOULEVARD UNIT 80 JUPITER FL 33478		DEFENDANT'S ADDRESS 601 E. PRATT STREET 6TH FLOOR BALTIMORE MD 21202			
PLAINTIFF'S NAME		DEFENDANT'S NAME			
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS			
PLAINTIFF'S NAME		DEFENDANT'S NAME			
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS			
TOTAL NUMBER OF PLAINTIFFS 1		TOTAL NUMBER OF DEFENDANTS 1		COMMENCEMENT OF ACTION	
				<input checked="" type="checkbox"/> Complaint	<input type="checkbox"/> Petition Action
				<input type="checkbox"/> Writ of Summons	<input type="checkbox"/> Notice of Appeal
				<input type="checkbox"/> Transfer From Other Jurisdictions	<input type="checkbox"/> Settlement
AMOUNT IN CONTROVERSY		COURT PROGRAMS		<input type="checkbox"/> Arbitration	<input type="checkbox"/> Mass Tort
<input type="checkbox"/> \$50,000.00 or less		<input checked="" type="checkbox"/> Jury		<input type="checkbox"/> Savings Action	<input type="checkbox"/> Commerce
<input checked="" type="checkbox"/> More than \$50,000.00		<input type="checkbox"/> Non-Jury		<input type="checkbox"/> Petition	<input type="checkbox"/> Minor Court Appeal
		<input type="checkbox"/> Other:			<input type="checkbox"/> Statutory Appeals
Settlement		Minors		W/D/Survival	
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT					
STATUTORY BASIS FOR CAUSE OF ACTION					
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)				IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
FILED PRO PROTHY JUN 27 2025 S. RICE					
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>GARY COHEN</u> Papers may be served at the address set forth below.					
NAME OF PLAINTIFF/S/PETITIONER/S/APPELLANT'S ATTORNEY KEVIN RILEY		ADDRESS 1818 MARKET ST SUITE 2400 PHILADELPHIA PA 19103			
PHONE NUMBER (215) 246-9268		FAX NUMBER none entered			
SUPREME COURT IDENTIFICATION NO. 330560		E-MAIL ADDRESS kriley@lundylaw.com			
SIGNATURE OF FILING ATTORNEY OR PARTY KEVIN RILEY		DATE SUBMITTED Friday, June 27, 2025, 03:52 pm			

LUNDY LAW, LLP
 By: Kevin J. Riley, Esq.
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Attorney for Plaintiff
*Filed and Attested by the
 Office of Judicial Records
 27 JUN 2025 03:52 pm*

ASSESSMENT OF DAMAGES HEARING

IS [] IS NOT REQUIRED

[X] Jury [] Non-Jury [] Arbitration

Gary Cohen
 246 Tresana Boulevard
 Unit 80
 Jupiter, FL 33478
 United States

Plaintiff

vs.

Stadium Casino RE, LLC dba Live Casino & Hotel
 Philadelphia
 601 E Pratt Street 6th Floor
 Baltimore, Md 21202

Defendant

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY
 Trial Division

NO.

NOTICE TO DEFEND

MVA 2V

NOTICE

``You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

``YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
 Lawyer Referral and Information Service
 One Reading Center
 Philadelphia, Pennsylvania 19107
 (215) 238-6333
 TTY (215) 451-6197

AVISO

``Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días, de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

``LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion De Licenciados
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 One Reading Center
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Attorney for Plaintiff

ASSESSMENT OF DAMAGES HEARING

IS [] IS NOT REQUIRED
 Jury [] Non-Jury [] Arbitration

<p>Gary Cohen 246 Tresana Boulevard Unit 80 Jupiter, FL 33478 United States</p> <p style="text-align: center;"><i>Plaintiff</i></p> <p>vs.</p> <p>Stadium Casino RE, LLC dba Live Casino & Hotel Philadelphia 601 E Pratt Street 6th Floor Baltimore, Md 21202</p> <p style="text-align: center;"><i>Defendants</i></p>	<p>COURT OF COMMON PLEAS PHILADELPHIA COUNTY Trial Division</p> <p>,</p> <p>NO.</p>
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COMPLAINT

1. Plaintiff, Gary Cohen, is an adult individual who resides at the address noted in the caption.

2. Defendant, Stadium Casino RE, LLC dba Live Casino & Hotel Philadelphia (“Live Casino”), is a limited liability corporation that is registered to do business in Pennsylvania with a place of business located at the address noted in the caption and that regularly conducts business in Philadelphia County, Pennsylvania.

3. At all times relevant hereto, Defendant owned, operated, leased, maintained, managed, supervised, possessed, and controlled the Live Casino & Hotel Philadelphia located at 900 Packer Ave, Philadelphia, PA 19148 (“the premises”).

4. At all times relevant hereto, there was a dangerous and/or hazardous condition in the

nature of a clear glass panel with no visible markings, decals, warnings, or other visual indicators to alert patrons of its presence, rendering it a dangerous and defective condition.

5. At all times relevant hereto, Defendant was enshrined with the duty to keep the premises free and clear of dangerous conditions.

6. At all times relevant hereto, Defendant was aware that this dangerous condition was a dangerous and defective condition.

7. At all times material hereto, Defendant acted and/or failed to act by and through its respective agents, servants, workmen, and/or employees.

8. On, May 2, 2024, at approximately 6:30 a.m., Plaintiff, Gary Cohen, was an invitee on Defendant's premises when he walked into the glass doors at the souvenir shop on the premises, and he sustained personal injuries more fully set forth at length below.

9. As a direct and proximate result of the aforesaid negligence of Defendant, Plaintiff, Gary Cohen, has suffered severe and permanent injuries to his body which include, but are not limited to, direct trauma to the bridge of his nose, traumatic brain injury, concussion, post-concussion syndrome, significant bleeding from the nose, lightheadedness, and dizziness.

10. As a direct and proximate result of the aforesaid negligence of Defendant, Plaintiff, Gary Cohen, suffered internal injuries of an unknown nature, he suffered severe aches, pains, mental anxiety and anguish and a severe shock to his entire nervous system and other injuries the full extent of which is not yet known.

11. As a direct and proximate result of the aforesaid negligence of Defendants, Plaintiff, Gary Cohen, sustained an aggravation and/or exacerbation of injuries both known and unknown. He has in the past and will in the future undergo severe pain and is unable to attend to his usual duties and occupation, all to his great financial detriment and loss.

12. As a direct and proximate result of the negligence of Defendant, Plaintiff, Gary Cohen, has been compelled to effectuate a cure for the aforesaid injuries, to expend large sums of money for medicine and medical attention and may be required to expend additional sums for the same purpose in the future.

13. As a direct and proximate result of the negligence of Defendants, Plaintiff, Gary Cohen, has been prevented from attending to his usual daily activities and duties, and may be so prevented for an indefinite period of time in the future, all to his great detriment and loss.

14. As a direct and proximate result of the negligence of Defendants, Plaintiff, Gary Cohen, has suffered physical pain and mental anguish and humiliation and may continue to suffer same for an indefinite period of time in the future.

COUNT I

Plaintiff, Gary Cohen v. Defendant, Stadium Casino RE, LLC dba Live Casino & Hotel

Philadelphia

15. Plaintiff, Gary Cohen, incorporates herein by reference the allegations contained in the above paragraphs as though the same was herein set forth at length.

16. The aforesaid act was caused as a direct and proximate result of the carelessness and negligence of Defendant by and through its agents, servants, workmen, and/or employees and consisted of the following:

- a. failing to warn and/or adequately warn individuals of said dangerous, defective, and hazardous condition on the premises;
- b. causing and/or permitting a dangerous and hazardous condition to exist without any warning signs, which Defendant knew or should have known caused an unreasonable risk of harm to business invitees;
- c. failing to properly and adequately maintain the premises so as to prevent the

dangerous and hazardous condition to exist;

- d. failing to property and adequately police and inspect the premises so as to prevent the dangerous and hazardous condition to exist;
- e. failing to place visible markings, stickers, or warnings on the clear glass door;
- f. failing to warn invitees, including Plaintiff, of the dangerous condition posed by the unmarked glass door;
- g. failing to protect the safety of invitees as it relates to the above acts of negligence;
- h. causing, allowing and/or permitting the dangerous condition on the premises, so as to constitute a menace, danger, nuisance and trap to invitees on the subject premises; and
- i. failing to properly perform its statutory, common law, industry standard and ordinance duties as it relates to the above acts of negligence.

WHEREFORE, Plaintiff, Gary Cohen, demands judgment in his favor against Defendant, individually, jointly, and/or severally in a sum in excess of Fifty Thousand Dollars (\$50,000.00) plus pre and post judgment interest and all other relief allowed by law.

LUNDY LAW, LLP



Date: June 27, 2025

BY: _____

Kevin Riley, Esquire
Attorney for Plaintiff, Gary Cohen

VERIFICATION

I, Gary Cohen, hereby state that I am the plaintiff in this action and verify that the statements made in the foregoing Civil Action Complaint _____
_____ are true and correct to the best of my knowledge, information and belief. I understand that the statements therein are made subject to the penalties of 18 PA. C.S.A. §4904 relating to unsworn falsification to authorities.



GARY COHEN

Date: 06/24/2025